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To those involved with the Alignment of an EMS with NEPA,

My name is Robert Auerbach and I am the ISO 14001 Product Champion for KEMA Registered Quality, an ISO 14001 Registrar. A Registrar is an organization that performs audits and certifies companies in conformance to the ISO 14001 Standard.

I would suggest two components to include as comments to the guide that is being considered: 1. using an outside auditing organization to verify that the EMS system meets both ISO 14001 (or its equivalent) and the NEPA guidelines; 2. understanding that there is business/organizational value for having an EMS and for integrating it into the "business" objective or mission of the organization.

1. I know I am representing such an organization that does this type of outside auditing but there is a value, which I believe, to such an outside service. It is as simple as the aphorisms of "you cannot see your own hump" and "you are asking the fox to guard the chicken coup" An outsider is simply an objective set of eyes that, to stakeholders, are more credible than the organization's own set of eyes.
2. A robust EMS can be of value to the organization, even if the organization is a not-for-profit governmental agency. All organizations have goals and mission statements: some are from stockholders while others from stakeholders such as the people of the United States. Whether the goals and missions are monetary or conceptual, an EMS can be integrated into the Business Management System so that the EMS is not a liability but a valuable component.

I hope the above will provide further discussions.

Thank you.

Bob Auerbach